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9
10 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

11 GINO MARAVENTANO; and
12 NEESHA KURJI

13 Plaintiffs,

14 v.

15 NORDSTROM, INC., a Washington
Corporation; and DOES 1 through 10,
inclusive,

16 Defendants.

17 Master Case No. 10cv2671 JM (WMc)

18
19 DEFENDANT NORDSTROM,
INC.'S NOTICE OF
POTENTIALLY RELATED CASE

20 [S.D. Local Rule 40.1]

21 [This filing relates to case number
22 11cv2609]

23 GINA BALASANYAN, an individual,
and NUNE NALBANDIAN, an
individual, on behalf of themselves and
all others similarly situated,

24 Plaintiffs,

25 v.

26 NORDSTROM, INC., a Washington
Corporation; and DOES 1 through 10,
inclusive,

27 Defendants.

1 TO PLAINTIFFS, THEIR ATTORNEYS OF RECORD AND THE COURT:

2 Please take notice that Defendant Nordstrom, Inc. (“Nordstrom”) submits the
 3 following Notice of Potentially Related Case pursuant to United States District Court,
 4 Southern District of California Local Rule 40.1. For the reasons specified below,
 5 Nordstrom does not believe that the matter disclosed is related, but submits this notice
 6 out of an abundance of caution to ensure compliance with the local rules.

7 NOTICE OF POTENTIALLY RELATED CASE

8 The following Illinois case may be related to the Balasanyan and Maraventano
 9 actions:

10 *Beverly Gulley and Dina Pappas v. Nordstrom, Inc.*, Circuit Court of Cook
 11 County, Illinois County Department, Chancery Division, Case No. 2013-CH-17490
 12 (the “*Gulley* action”). The *Gulley* action is a putative class action filed on July 24,
 13 2013 by two former Nordstrom salespeople who worked at a Nordstrom store located
 14 in Oak Brook, Illinois. The plaintiffs in the *Gulley* action allege two legal claims for:
 15 (1) violation of the Illinois Wage Payment and Collection Act (“IWPCA”); and (2)
 16 violation of the Illinois Minimum Wage Law (“IMWL”). With respect to their
 17 IWPCA claim, the *Gulley* plaintiffs seek to represent all sales associates “who were
 18 compensated, in part or in full, on a commission basis in Illinois at any time between
 19 July 24, 2003 and the present who did not receive the full amount of wages earned and
 20 owed to them for work they performed without pay during Non-Sale Time in excess
 21 of [Nordstrom’s] Policy Time.” With respect to the IMWL claim, the *Gulley*
 22 plaintiffs seek to represent all sales associates “who were compensated, in part or in
 23 full, on a commission basis in Illinois at any time between July 24, 2010 and the
 24 present who did not receive the full amount of overtime wages earned and owed to
 25 them for work they performed in excess of forty (40) hours per week without pay.”

26 Nordstrom does not believe it is necessary or appropriate to assign the *Gulley*
 27 case to this Court, including because: (1) there is no overlap between the classes at
 28 issue in each case (*Gulley* involves a putative class of only Illinois sales associates and

NOTICE OF POTENTIALLY RELATED
CASE

1 this case involves a class of only California sales associates); and (2) there is no
2 overlap between the claims at issue in each case (this case involves only claims under
3 California law whereas the *Gulley* case involves only claims under Illinois law).

4 For these reasons, assignment to a single judge is unlikely to effect a savings of
5 judicial effort or other economies.

6 Dated: August 16, 2013

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8 /s/Joshua D. Levine
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